

NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

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| RE: ROBERT R ROJAS |) | Case No. 23 B 01997 |
| MAGDIELL D C ROJAS |) | |
| |) | Chapter 13 |
| Debtor(s) |) | |
| |) | Judge: CAROL A DOYLE |

NOTICE OF MOTION & CERTIFICATE OF SERVICE

ROBERT R ROJAS
MAGDIELL D C ROJAS
4930 W NEWPORT
CHICAGO, IL 60641

PRO SE DEBTOR
ACTING AS OWN ATTORNEY

Please take notice that on March 14, 2023 at 9:15 am., I will appear before the Honorable Judge Carol A Doyle or any judge sitting in the judge's place, **either** in Courtroom 742, Everett McKinley Dirksen United States Courthouse, 219 S. Dearborn Street, Chicago, IL 60604, **or** electronically as described below, and present the motion of trustee for failure to file a plan, a copy of which is attached.

All parties in interest, including the movant, may appear for the presentment of the motion either in person or electronically using Zoom for Government.

You may appear electronically by video or by telephone.

To appear by video, use this link: <https://www.zoomgov.com>. Then enter the meeting ID and passcode.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and passcode.

Meeting ID and passcode. The meeting ID for this hearing is 161 155 8289 and the passcode is Doyle742. The meeting ID and passcode can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail or by the methods indicated on March 03, 2023.

/s/ Thomas H. Hooper

Thomas H. Hooper, Trustee

Thomas H. Hooper
Chapter 13 Trustee
55 E. Monroe St., Suite 3850
Chicago, IL 60603
(312) 294-5900

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

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MOTION TO DISMISS CASE FOR FAILURE TO FILE A PLAN

Now comes Thomas H. Hooper, Trustee and requests that this case be dismissed pursuant to 11 U.S.C. §1307(c), and in support thereof respectfully states the following:

1. Debtor(s) filed the above captioned case on February 16, 2023.
2. Pursuant to 11 U.S.C. § 1321, "the debtor shall file a plan".
3. Pursuant to Bankruptcy, Rule 3015, "If a plan is not filed with the petition, it shall be filed within 14 days thereafter and such time shall not be further extended except for cause shown and on notice as the court may direct."
4. Fourteen days from the date of filing the petition has expired.
5. Debtor(s) has failed to file a plan or request an extension of time in which to file a plan.

WHEREFORE, the Trustee prays that this case be dismissed, and for any and all other relief this Court deems just and proper.

Thomas H. Hooper
Chapter 13 Trustee
55 E. Monroe St., Suite 3850
Chicago, IL 60603
(312) 294-5900

/s/ Thomas H. Hooper

Thomas H. Hooper, Trustee